

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION  
CIVIL ACTION NO: 1:16-cv-1174**

<b>NORTH CAROLINA MUTUAL</b>	)
<b>LIFE INSURANCE COMPANY, a</b>	)
<b>North Carolina Corporation,</b>	)
	)
<b>Plaintiff,</b>	)
	)
<b>v.</b>	)
	)
<b>STAMFORD BROOK CAPITAL,</b>	)
<b>LLC, a Delaware limited liability</b>	)
<b>company, <i>et al.</i></b>	)
	)
	)
<b>Defendants.</b>	)

**NORTH CAROLINA MUTUAL LIFE INSURANCE COMPANY’S RENEWED  
MOTION FOR SANCTIONS**

Plaintiff North Carolina Mutual Life Insurance Company (“NC Mutual”), pursuant to this Court’s March 13, 2024 Order [D.E. 275] and Fed. R. Civ. P. 37, files this Renewed Motion for Sanctions against Defendant Bradley Reifler. Reifler engaged in repeated, egregious acts of evidence spoliation and flagrant disregard of this Court’s discovery orders. This Court has already found that Reifler’s conduct warrants sanctions pursuant to Rule 37. [D.E. 275]. The only remaining issue is the appropriate remedy. For the reasons set forth in the accompanying memorandum, NC Mutual respectfully requests this Court enter a default judgment against Reifler.

Respectfully submitted this the 24<sup>th</sup> day of September, 2024.

WILLIAMS MULLEN

/s/Wes J. Camden

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## CERTIFICATE OF SERVICE

I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record and parties that have made an appearance in this civil action. I also certify that the attached was served upon the *pro se* parties below by mailing copies thereof to the addresses indicated below with the proper postage attached and deposited in an official depository under the exclusive care and custody of the United States Postal Service in Raleigh, North Carolina.

Bradley Carl Reifler  
Register Number: 20251-509  
FCI Lewisburg  
Federal Correctional Institution  
P.O. Box 1000  
Lewisburg, PA 17837

This the 24<sup>th</sup> day of September, 2024.

WILLIAMS MULLEN

/s/ Wes J. Camden  
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